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Attorneys for Plaintiffs

[additional counsel listed in signature block]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

NAACP OF SAN JOSÉ/ SILICON VALLEY;
ET AL.,

Plaintiffs,

v.

CITY OF SAN JOSÉ; ET AL.,

Defendants.

Case No. 4:21-cv-01705 PJH

**STIPULATION AND ~~PROPOSED~~ ORDER
CONTINUING HEARING ON CLASS
CERTIFICATION AND SUMMARY
JUDGMENT BRIEFING SCHEDULE**

Pursuant to L.R. 6-2 and 7-12, the Parties in the above-entitled action hereby enter into a stipulation as set forth below.

At the initial case management conference, the Court scheduled the hearing on class certification for November 11, 2022 (Dkt. 50).

1 The Parties continue to work diligently and cooperatively to complete written discovery,
 2 complete fact-discovery depositions, and resolve any disputes that may arise promptly and without
 3 court intervention. However, given the amount of outstanding fact discovery, additional time is
 4 needed to complete discovery in anticipation of class certification and summary judgment briefing.
 5 The parties therefore agree that good cause exists for an extension of deadlines in this matter and
 6 agree to the following briefing schedule on class certification and summary judgment:

- 7 1. Plaintiffs' motion for class certification shall be due on December 16, 2022.
- 8 2. Defendants' opposition to class certification shall be due on January 23, 2023.
- 9 3. Plaintiffs' reply in support of class certification shall be due on February 6, 2023.
- 10 4. Hearing on Plaintiffs' motion for class certification shall be held on February 23, 2023.
- 11 5. Dispositive motions shall be due on April 14, 2023.
- 12 6. Hearing on dispositive motions shall be held on May 25, 2023.

13 The following stipulations for extension of time have been filed in this action:

- 14 1. Stipulation to Enlarge Time for Briefing Re Defendants' Motion to Dismiss filed on May
 15 12, 2021 (Dkt. 24); granted on May 12, 2021 (Dkt. 25).
- 16 2. Stipulated Request to Enlarge Defendants' Time to File an Answer and [Proposed] Order
 17 filed on December 10, 2021 (Dkt. 52); granted on December 13, 2021 (Dkt. 53).
- 18 3. Stipulation with Proposed Order to Extend Deadline to Amend Pleadings filed on July
 19 14, 2022 (Dkt. 60); granted on July 19, 2022 (Dkt. 61).
- 20 4. Stipulation with Proposed Order to Modify Case Schedule filed on September 16, 2022
 21 (Dkt. 64); granted on September 19, 2022 (Dkt. 66).

22 IT IS SO STIPULATED.

23 Dated: September 23, 2022

Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

25 By: /s/ Tammy B. Webb –
 26 Tammy B. Webb

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1 Dated: September 23, 2022

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1 Pursuant to L.R. 5-1(h), I attest that concurrence in the filing of this document has been
2 obtained from the other signatories.

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4 By: /s/ Tammy B. Webb
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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.



Dated: September 28, 2022

UNITED STATES DISTRICT JUDGE
HONORABLE PHYLLIS J. HAMILTON